ENVIRON



September 7, 1999

Federal Express

U.S. Environmental Protection Agency 2890 Woodbridge Avenue Bldg. 209 (MS-211) Edison, New Jersey 08837 Attention: Cornell-Dubilier Electronics Site On-Scene Coordinator

Chief, New Jersey Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency
290 Broadway, 17th Floor
New York, New York 10007-1866
Attention: Cornell-Dubilier Electronics Site Attorney

Re: Cornell-Dubilier Electronics Site - Administrative Order on Consent for Removal Action, Index No. II-CERCLA-99-2006
Progress Report No. 13

Dear Sirs:

As specified in Paragraph 50 of the above-referenced Administrative Order, on behalf of Respondents Cornell Dubilier Electronics, Inc. (CDE) and Dana Corporation (Dana), ENVIRON Corporation (ENVIRON) is submitting this progress report which summarizes activities conducted pursuant to this AOC between August 11 and August 25, 1999.

Completed Activities

During this period, the following activities were completed:

- Revision of restoration plans based on comments provided by property owners. The revised restoration plans were distributed to the property owners and USEPA on August 20, 1999.
- Laboratory analysis of additional characterization and verification samples collected on August 3, 1999.

Ongoing Activities

During this period, the following activities were initiated and/or are in-progress:

- Preliminary discussions with a prospective contractor regarding removal action implementation and restoration details.
- Preparation of a request for bid to be issued to prospective remediation contractor(s).
- Follow-up discussions regarding the request for access to Tier II Property W via the Hamilton Industrial Park, and for access to the property adjacent to Tier II Property AA.
- Evaluation of draft verification data from August 3, 1999 sampling event.
- Discussions with the owner of Property AA regarding sampling of the gravel commercial parking lot adjoining the residential area on this property.

Two-Week Schedule of Planned Activities

In addition to the ongoing activities, during the next two-week period (August 26 through September 8, 1999) the following activities are planned:

- Distribution of the request for bid to prospective remediation contractor(s) upon receipt of approval for the Revised Work Plan.
- Evaluation of excavation delineation based on additional characterization and verification data.
- Validation of data for samples collected on August 3, 1999.
- Submittal of notification to USEPA and appropriate state agencies of the facilities selected for the disposal of soils and other wastes generated during the removal action implementation.

One-Month Schedule of Planned Field Activities

In addition to the ongoing activities, during the next four-week period (August 26 through September 22, 1999) the following activities are planned:

- Additional characterization sampling on Property AA.
- Final verification sampling on the seven properties, as necessary based on evaluation of draft data from August 3, 1999 sampling event.

Mobilization of remediation contractor to initiate removal action activities.

Please call Mark Nielsen or me at (609) 452-9000 if you should have any questions regarding this progress report.

Sincerely,

Michael P. Scott

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R. Sanoff, Esq. cc:

M. Last, Esq.